Case 2:12-cv-05257-SRC-CLW Document 20 Filed 03/11/13 Page 1 of 2 PageID: 161

Case 2:12-cv-05257-SRC-CLW Document 19-1 Filed 03/08/13 Page 1 of 2 PageID: 159

UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

MONTVALE SURGICAL CENTER, LLC a/s/o various "PATIENTS",

Plaintiff,

VS.

CONNECTICUT GENERAL LIFE INSURANCE COMPANY d/b/a CIGNA, CIGNA HEALTHCARE OF NEW JERSEY, INC.; ABC CORPS. (1-10)(said names being fictitious and unknown entities),

Defendants.

Document Filed Electronically

Civil Action No. 12-05257 (SRC)(CLW)

STIPULATION AND CONSENT
ORDER TO EXTEND TIME TO
REPLY IN FURTHER SUPPORT OF
DEFENDANTS' MOTION TO
DISMISS AND RESPOND TO
PLAINTIFF'S CROSS-MOTION TO
AMEND THE COMPLAINT

This matter having been brought before the Court on the joint application of Defendants Connecticut General Life Insurance Company and CIGNA Healthcare of New Jersey (collectively, "Defendants"), by their counsel, Gibbons P.C., and Plaintiff Montvale Surgical Center, LLC, by its counsel, Massood & Bronsnick, LLC, for the entry of a Stipulation and Consent Order to extend the time for Defendants to reply in further support of their Motion to Dismiss and respond to Plaintiff's Cross-Motion to Amend the Complaint; it being further stipulated that (1) Defendants' Reply and Response are due on March 11, 2013; (2) with this extension, Defendants' Reply and Response would be due on March 25, 2013; and (3) with this extension, the new return date of the motions would be April 1, 2013; and good cause appearing for the entry of an Order extending the time within which Defendants may reply in further support of their Motion to Dismiss and respond to Plaintiff's Cross-Motion to Amend the Complaint,

Case 2:12-cv-05257-SRC-CLW Document 20 Filed 03/11/13 Page 2 of 2 PageID: 162

Case 2:12-cv-05257-SRC-CLW Document 19-1 Filed 03/08/13 Page 2 of 2 PageID: 160

IT IS on this _____ day of March 2013,

ORDERED that the time within which Defendants reply in further support of their Motion to Dismiss and response to Plaintiff's Cross-Motion to Amend the Complaint be and hereby is extended to March 25, 2013; and

IT IS FURTHER ORDERED that the new return date on both motions is April 1, 2013.

STIPULATED AND AGREED TO BY:

s/Allana L. Nason, Esq.
Allana L. Nason, Esq.
E. Evans Wohlforth, Jr., Esq.
GIBBONS P.C.
One Gateway Center
Newark, New Jersey 07102-5310

Tel: (973) 596-4583 Fax: (973) 639-6389 Attorneys for Defendants

Dated: March 8, 2013

s/Andrew R. Bronsnick

Andrew R. Bronsnick, Esq. MASSOOD & BRONSNICK, LLC 50 Packanack Lake Road East Wayne, NJ 07470-6663

Tel: (973) 696-1900 Fax: (973) 696-4212 Attorneys for Plaintiff

Dated: March 8, 2013

SO ORDERED:

Honorable Stanley R. Chesler United States District Judge